



Hilcorp Alaska, LLC

Post Office Box 244027  
Anchorage, AK 99524-4027

3800 Centerpoint Drive  
Suite 1400  
Anchorage, AK 99503

Phone: 907/777-8300  
Fax: 907/777-8301

October 30, 2017

Ms. Michelle Pirzadeh  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, WA 98101

RECEIVED ON:

NOV 06 2017  
SAW  
EPA Region 10  
Office of the Regional Administrator  
OCE-108

Re: **40 CFR 60 Subpart OOOOa Annual Compliance Report**

Dear Ms. Pirzadeh,

Hilcorp Alaska LLC (Hilcorp) is submitting the attached initial annual compliance report for 40 Code of Federal Regulation (CFR) Part 60 Subpart OOOOa, "Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015." In accordance with 40 CFR 60.541 Oa, the attached report includes information for each of the onshore affected facilities triggered during the reporting period of August 2, 2016 through August 2, 2017.

Ongoing litigation\* regarding 40 CFR 60 Subpart OOOOa is creating uncertainty regarding the status of fugitive emission monitoring requirements. In an effort to achieve compliance, Hilcorp has prepared a Fugitive Emissions Monitoring Plan and intends to complete fugitive emissions monitoring requirements before the end of the calendar year. A copy of the Fugitive Emissions Monitoring Plan can be provided upon request. A list of the affected well site facilities is provided in the attached report.

Please contact Drew Anderson at (907) 777-8488 or [ananderson@hilcorp.com](mailto:ananderson@hilcorp.com), if you have any questions or require additional information regarding this notification.

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Sincerely,

David S. Wilkins  
Senior Vice President, Hilcorp Alaska, LLC

Attachments: Site Information Report  
Well Affected Facilities Report

\* The opinion in *Clean Air Council v. Environmental Protection Agency*, Case No. 17-1145 (DC Cir.), was issued on July 3, 2017. The mandate was issued on July 31, 2017. A petition for rehearing en banc was denied on August 10, 2017. The time period for filing a petition for certiorari with the U.S. Supreme Court will expire on November 8, 2017.

cc: Compliance Technician, ADEC-Fairbanks

## SITE INFORMATION REPORT

